

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO.:
	:	
v.	:	
	:	VIOLATIONS: 18 U.S.C. § 1029
WILLIAM C. SHELTON,	:	(Access Device Fraud)
	:	
Defendant.	:	18 U.S.C. § 982(a)(2)(B)
	:	(Criminal Forfeiture)
	:	

INFORMATION

The United States hereby informs the Court that:

COUNT ONE

Between in or about August of 2010 and August of 2011, within the District of Columbia and elsewhere, defendant William C. Shelton, knowingly and with intent to defraud, trafficked in and used one or more unauthorized access devices, that is, a Wachovia Bank debit card issued to the Advisory Neighborhood Commission in Ward 5B, and by such conduct, obtained something of value aggregating \$1,000 or more during a one-year period, such trafficking and use affecting interstate commerce in that fraudulent credit and debit card transactions utilize banking channels for gaining authorization approval for charges.

(Access Device Fraud, in violation of Title 18, United States Code, Section 1029(a)(2))

FORFEITURE ALLEGATION

The violation alleged in Count One of this Information, Access Device Fraud, in violation of Title 18, United States Code, Section 1029(a)(2), is re-alleged and incorporated by reference herein for the purpose of alleging forfeiture to the United States of America, pursuant to the provisions of Title 18, United States Code, Section 982(a)(2)(B)).

As a result of the offense alleged in Count One of this Information, the defendant in this Information, WILLIAM C. SHELTON, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(2)(B), any property constituting, or derived from proceeds obtained directly or indirectly, as a result of the said violation, including but not limited to:

(a) Money Judgment:

(i) a judgment in favor of the United States for a sum of money in the amount of twenty-eight thousand five hundred twenty-six dollars and twenty-one cents (\$28,526.21), representing the amount of proceeds obtained as a result of the offense, Access Device Fraud, in violation of Title 18, United States Code, Section 1029(a)(2).

By virtue of the commission of the offense charged in Count One of this Information, any and all interest that the defendant, WILLIAM C. SHELTON, has in the property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of the charged offense, is vested in the United States and hereby forfeited to the United States pursuant to Title 18, United States Code, Section 982(a)(2)(B).

If any of the property described above as being subject to forfeiture pursuant to Title 18, United States Code, Section 982(a)(2)(B), as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property that cannot be subdivided without

difficulty;

it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the said defendant up to the value of said property listed above as being subject to forfeiture.

(Criminal Forfeiture, Title 18, United States Code, Section 982(a)(2)(B))

Respectfully submitted,

RONALD C. MACHEN JR.

UNITED STATES ATTORNEY

By:


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